

-EXHIBIT 4-

Jasit Gotra
December 7, 2017

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5 Civil Action No. 4:15-cv-06314-YGR

7 ABANTE ROOTER AND PLUMBING, INC., *

8 MARK HANKINS, and PHILIP J. CHARVAT, *

individually and on behalf of all *

others similarly situated, *

5 Plaintiffs *
10 v. *
11 *
12 ALARM.COM INCORPORATED, and *
13 ALARM.COM HOLDINGS, INC., *
14 Defendants *

16 DEPOSITION OF: JASIT GOTRA
17 CATUOGNO COURT REPORTING SERVICES, INC.
18 155 South Main Street, Suite 201
19 Providence, Rhode Island
20 December 7, 2017 2:03 p.m.

22 Ellen M. Muir
23 Court Reporter

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1 A. I wouldn't because of the time. I mean, we
2 were too small. I'm not sure what the recordkeeping
3 practices were.

4 Q. But such as they were if anybody knew how you
5 kept records, it was you?

6 MR. SCHLESSINGER: Objection. Form of the
7 question. I just have to get my objection out. (To
8 the witness) if you can just pause a second before
9 you answer so I can do that, then you can go ahead
10 and answer.

11 Q. And did you -- was this e-mail kept and made
12 at or about the time it was sent?

13 A. Yes.

14 Q. Okay. And do you know where this e-mail was
15 produced?

16 A. No.

17 Q. You don't know what case it came from? Okay.
18 And I'm going to show you now Exhibit 2, which is Bates
19 stamped VMS 293. I'll try to make it a little bigger here.
20 Do you recognize that document? And you may not.

21 A. No.

22 Q. Do you remember providing documents to the
23 federal trade commission in connection with a civil
24 investigative demand served on you?

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1 A. I recall that we provided a bunch of
2 documents.

3 Q. **A bunch of documents?**

4 A. Yeah.

5 Q. **And was one of the things they required you to**
6 **provide where you got your opt-in data?**

7 A. Yes, I believe so, as part of the message.

8 Q. **And is this document an example of what you**
9 **provided to the FTC?**

10 A. I don't recall. I'm not, like, there was --
11 we provide hundreds of documents and as far as I remember.
12 I'm not sure if this was one of them.

13 Q. **And do you know where Revocalize got the data**
14 **that it was providing to you as opt-in data?**

15 A. No.

16 Q. **Did VMS, slash, Alliance receive complaints**
17 **about consumers about calls that they were getting?**

18 A. Can you repeat that. I apologize.

19 Q. **Did you get complaints from people who said,**
20 **Look, I'm on the Do Not Call List. Why am I being called?**

21 A. Yes.

22 Q. **When did you start getting those complaints?**

23 A. I don't recall.

24 Q. **It's pretty earlier on in VMS's, slash,**